

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

**AMENDED UNOPPOSED MOTION FOR SINGULAR INSTANCE MODIFICATION  
OF PRESENTENCING RELEASE CONDITIONS AND TO AUTHORIZE TRAVEL**

Defendant Antonio Serna, by and through undersigned counsel, hereby moves this honorable Court for the entry of an amended order allowing him to travel to El Salvador for business for up to seven days between the dates of December 1, 2024, and December 20, 2024, and in support thereof states as follows:

I.

Serna pled guilty to Count 1 of an Information, which charged him with conspiracy to commit health care fraud in violation of 18 U.S.C. § 371. (ECF 1.) After several agreed continuances, as discussed in the sealed motions filed with this Court, Mr. Serna is currently scheduled to be sentenced on February 13, 2025. (ECF 58.) Mr. Serna has been enlarged on bond, subject to conditions, since his plea. He has complied with all conditions of his bond and supervision, including the requirement that he not travel outside of the confines of this District without Court permission. Mr. Serna has not made any previous travel requests.

III

Currently, Mr. Serna works as the President and lead representative of Black Gold Texas

Tea Oil LLC. The company has recently been awarded a concession to build a refinery in El Salvador. The company requests that, given the importance of the project, Mr. Serna be allowed to travel to El Salvador to meet with local contractors about the construction of the refinery, to visit the site that was selected by the Salvadoran Presidential Office, and to meet with President Nayib Bukele and other high-level officials to discuss the project's scope and alignment with Salvadoran interests.

On November 12, 2024, this Court approved Mr. Serna's request to travel to El Salvador as described above for a seven-day period between November 13, 2024 and November 26, 2024. However, due to delays in finalizing the trip, the schedule for President Bukele and other officials has shifted, leading to this amended motion requesting a change in the approved dates. Once Mr. Serna's travel plans are set, he will inform the Department of Pretrial Services for the Northern District of Texas of his exact flight plans, where he will be staying, and how he can be contacted while he is gone.

### III.

The government does not oppose the requested travel. Likewise, Mr. Serna's Probation Officer is supportive of the request and has no objection to it. Because Serna has been compliant with his conditions of release and will continue to do so, the requested travel will not harm the public interest.

WHEREFORE, Defendant Antonio Serna respectfully requests that this Court modify his conditions of release to allow him, for purposes of this single instance, to travel to El Salvador for a period of up to seven days between December 1, 2024, and December 20, 2024, and for all other relief this Court deems fair and just.

Respectfully submitted,

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ATTORNEYS FOR DEFENDANT  
ANTONIO SERNA

#### **CERTIFICATE OF CONFERENCE**

I hereby certify that on November 8, 2024, I conferred with AUSA Douglas Brasher on this motion and was informed that the government had no objection to the requested travel.

/s/ Elizabeth K. Stepp  
Elizabeth K. Stepp

#### **CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2024, a true and correct copy of the above and foregoing instrument was served electronically on all counsel of record via ECF.

/s/ Elizabeth K. Stepp  
Elizabeth K. Stepp